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(A complete list of counsel appears on the signature page.)

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

LOUJAIN HATHLOUL ALHATHLOUL,

Civil No. 3:21-cv-01787-IM

Plaintiff,

v.

**JOINT STATUS REPORT REGARDING
JURISDICTIONAL DISCOVERY**

DARKMATTER GROUP,
MARC BAIER,
RYAN ADAMS, and
DANIEL GERICKE

Defendants.

The parties to the above-captioned action, by and through their undersigned counsel, hereby provide the following joint status report, as directed by this Court in an Order dated June 17, 2024 (ECF 97).

1. On March 29, 2024, the day this Court approved of the parties' proposed jurisdictional discovery schedule (ECF 90), Plaintiff served on Defendants requests for production previously modified and then approved by the Court in its March 22, 2024 Order limiting the scope of jurisdictional discovery (ECF 88). Each of the Defendants responded to Plaintiff's requests for production in writing on April 12, 2024. Based on their written responses, none of the Defendants have produced any documents to Plaintiff.

2. Plaintiff also served interrogatories on Defendants on March 29, 2024, and each of the Defendants responded in writing on April 12, 2024. In response to each of Plaintiff's interrogatories, as modified and then approved by this Court in its March 22, 2024 Order, Defendants indicated that they lacked relevant knowledge and could not provide the requested information.

3. On May 17, 2024, Plaintiff took the deposition of Samer Khalife, the individual Defendant DarkMatter Group selected as its Rule 30(b)(6) designee. On May 24, 2024, Plaintiff took the deposition of Defendant Ryan Adams. On June 3, 2024, Plaintiff took the deposition of Defendant Daniel Gericke. And on June 11, 2024, Plaintiff took the deposition of Defendant Marc Baier. Counsel for Defendants instructed the deponents not to answer certain questions on the ground that they exceeded the scope of discovery directed by the Court. Counsel for Plaintiff noted on the record in each of the depositions that Plaintiff was leaving the deposition open based on counsel for Defendants' instructions not to answer.

4. In light of Defendants' answers to Plaintiff's discovery requests and the instructions not to answer by counsel for Defendants during the previous depositions, Plaintiff intends to move to compel. Defendants intend to contest Plaintiff's motion.

5. The parties propose the following briefing schedule for Plaintiff's forthcoming motion to compel:

- Plaintiff's motion and opening brief due on July 12, 2024;
- Defendants' opposition due on July 26, 2024; and
- Plaintiff's reply due on August 2, 2024.

WHEREFORE, the parties respectfully request that the Court enter the proposed briefing schedule set forth above.

Dated: June 21, 2024

Respectfully submitted,

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